

## **REMARKS/ARGUMENTS**

Claims 1-2, 7, and 21-24 are pending in the present application. In this amendment, Applicants have added claims 22-24, amended claims 1-2 and 21, and canceled claims 3-6 and 8-20 from further consideration in this application. Applicants are not conceding that the subject matter encompassed by claims 1-6 and 8-21, prior to this Amendment, is not patentable over the art cited by the Examiner. Claims 1-2 and 21 were amended and claims 3-6 and 8-20 were canceled in this Amendment solely to facilitate expeditious prosecution of the application. Applicants respectfully reserve the right to pursue claims, including the subject matter encompassed by claims 1-6 and 8-21 as presented prior to this Amendment and additional claims in one or more continuing applications. Reconsideration of the claims is respectfully requested.

### **I. Objection to Claims**

The Examiner objected to claims 1-2 and 21 because of informalities. Applicants have amended the claims in accordance with the Examiner's suggestions; therefore, these objections are believed to be overcome and should be withdrawn.

### **II. 35 U.S.C. § 112, Second Paragraph**

The Examiner has rejected claims 1-4, 7, and 21 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter, which applicants regard as the invention. Applicants have amended claims 1 and 21; therefore, this rejection is believed to be overcome and should be withdrawn.

### **III. 35 U.S.C. § 103, Obviousness**

The Examiner has rejected claims 1-4, 7, and 21 under 35 U.S.C. § 103 as being unpatentable over U.S. Patent 6,182,200, issued to *Duvall*. This rejection is respectfully traversed.

Applicants have amended claims 1 and 21 to recite:

determining a current configuration of said system by determining a speed of said particular I/O adapter that is included in said system and determining a data width for a particular slot in said system into which said particular I/O

adapter is inserted, wherein said current configuration is one of said plurality of different possible system configurations;

associating one of a plurality of different thresholds with each one of a plurality of different possible system configurations, wherein each one of said plurality of different possible system configurations includes one of a plurality of different I/O adapter speeds and one of a plurality of different data widths for a slot into which an I/O adapter is inserted

The combination of the cited prior art does not render Applicants' claims obvious because the combination does not teach or suggest these features.

The Examiner asserts that *Duvall* teaches determining a threshold that has been assigned to an I/O adapter. Applicants' claims now recite: "associating one of a plurality of different thresholds with each one of a plurality of different possible system configurations". *Duvall* does not teach this feature.

*Duvall* teaches identifying elements having sizes that are less than a predetermined threshold. *Duvall* does not teach associating different thresholds with different system configurations.

The Examiner asserts that *Oliver* teaches setting a threshold for a combination of I/O adapter, slot size, and system characteristics. Specifically, the Examiner states that *Oliver* teaches a number of channels, which the Examiner believes is analogous to a slot size. Applicants respectfully disagree.

Applicants claim one of a plurality of different data widths for a slot into which an I/O adapter is inserted.

*Oliver* teaches multiple channels of data being written to a single storage device simultaneously.

In one embodiment, a method of the present invention is used in an application in which multiple channels of data are written to or read from a disk simultaneously. The bandwidth of the application is partitioned into a number of different I/O channels. Each I/O channel has a continuous data rate that must be supported by the storage device, as well as a number of extra seeks (referred to as edits) that may be required by the channel to collect or write data from different locations on the device. For this embodiment, step 402 in FIG. 4 corresponds to defining the period over which an application defines an integral maximum number of edits for each channel. In general, an edit includes any operation involving discontinuous events stored on the disk. In this case, the application

must seek between different files on a disk, or between different blocks within the same file on a disk. Each edit is defined as an extra seek required while performing I/O on that channel over the given period. This is done whenever the application needs to switch a channel from performing I/O operations in the middle of one block to the middle of another block, as would be the case for accessing non-linear channels that have been edited. The maximum continuous data rate required by each channel is also determined.

*Oliver*, column 4, line 49, through column 5, line 5.

Thus, the bandwidth of an application is partitioned into I/O channels for a single storage device. A “channel”, as taught by *Oliver*, is not analogous to a “slot”, because an I/O adapter is not inserted into a channel.

The Examiner also asserts that *Oliver* teaches setting a threshold for each combination of I/O adapter, slot size, and system characteristics. More specifically, the Examiner asserts that *Oliver* teaches calculating a block size threshold as a function of the determined maximum input/output bandwidth, which the Examiner believes teaches a threshold.

Applicants claims now recite: “associating one of a plurality of different thresholds with each one of a plurality of different possible system configurations, wherein each one of said plurality of different possible system configurations includes one of a plurality of different I/O adapter speeds and one of a plurality of different data widths for a slot into which an I/O adapter is inserted”. *Oliver* does not teach these features.

The block size threshold taught by *Oliver* does not teach different thresholds that are associated with different system configurations, where each configuration includes one of different I/O adapter speeds. *Oliver* teaches the block size threshold being a function of an I/O bandwidth, not an I/O adapter speed.

The block size threshold taught by *Oliver* also does not teach different thresholds that are associated with different system configurations, where each configuration includes one of a plurality of data widths for a slot into which an I/O adapter is inserted. As discussed above, *Oliver* does not teach slots.

The remaining cited prior art does not cure the deficiencies of *Duvall* and *Oliver*; therefore, the combination of cited art does not render Applicants’ claims obvious.

#### **IV. Conclusion**

It is respectfully urged that the subject application is patentable over the cited prior art and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: May 27, 2008

Respectfully submitted,

/Lisa L.B. Yociss/

Lisa L.B. Yociss  
Reg. No. 36,975  
Yee & Associates, P.C.  
P.O. Box 802333  
Dallas, TX 75380  
(972) 385-8777  
Attorney for Applicants